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**UNITED STATES COURT**

**EASTERN DISTRICT OF CALIFORNIA**

SACRAMENTO HOMELESS UNION, a  
local of the CALIFORNIA HOMELESS  
UNION/STATEWIDE ORGANIZING  
COUNCIL, on behalf of itself and those it  
represents; BETTY RIOS; DONTA  
WILLIAMS; FALISHA SCOTT and all those  
similarly situated,

Plaintiffs

vs.

COUNTY OF SACRAMENTO, a political  
subdivision of the State of California; CITY  
OF SACRAMENTO, a municipal corporation;  
and DOES 1 – 100,

Defendants.

Case No.: 2:22-cv-01095-KJM-KJN

**SUPPLEMENTAL DECLARATION OF  
CRYSTAL ROSE SANCHEZ IN  
SUPPORT OF PLAINTIFFS' REPLY TO  
DEFENDANT COUNTY OF  
SACRAMENTO'S OPPOSITION TO  
PLAINTIFFS' MOTION FOR  
MANDATORY INJUNCTION**

Date: July 8, 2022

Time: 10:00 a.m.

Dept.: Courtroom 3

U.S. Chief District Judge Kimberly J. Mueller

**SUPPLEMENTAL DECLARATION OF CRYSTAL ROSE SANCHEZ**

I, CRYSTAL ROSE SANCHEZ, hereby swear and affirm that the following is a true and  
correct statement.

1. I am the President of the Sacramento Homeless Union ("SHU") and serve as a Western  
Regional Director and Executive Board Member of the National Union of the Homeless.
2. The SHU has approximately 2,800 members and provides outreach to over 392  
encampments in the Sacramento area. As a formerly homeless person and lifelong  
Sacramento resident, I have been supporting and organizing our unhoused community

Supplemental Declaration of Crystal Sanchez

1 for over 20 years. As Union president, I am intimately familiar with hundreds, if not  
2 thousands of homeless persons and because we have Union "leads" in all of the major  
3 homeless encampments, we have reliable system through which we receive accurate  
4 information regarding the status of the homeless, particularly during extreme weather  
5 conditions.

6  
7 3. Every year we face the same failures over the respite centers the lack of true  
8 commitment to policy procedure that dictates the well-being of our unhoused. The latest  
9 "point in time" count, released only days ago, showed that since 2019, there has been a  
10 67% increase in the number of unsheltered homeless persons. This represents a huge  
11 jump from the 5,570 persons previously identified by the County as unsheltered to 9,278  
12 persons on the streets with little or no protection from the extreme heat we have  
13 experienced and is forecasted for the next 14 days. Attached hereto as Exhibit A is a true  
14 and correct copy of a June 29, 2022 story by reporter Maricela De La Cruz on the  
15 increase in Sacramento Homelessness. Attached hereto as Exhibit B is a true and correct  
16 copy of today's National Weather Service 14-day forecast for the Sacramento area.

17  
18 4. The respite from extreme weather is not a new issue. In fact up until June 15, 2022 the  
19 County of Sacramento dictated cruel temperature specifications for the provision of  
20 respites, also known as "cooling centers" while in last week of June, 2022, we had seven  
21 consecutive days of triple-digit temperatures.

22  
23 5. Since the Homeless Union filed for a temporary restraining order, I have made repeated on-  
24 the-ground visits to homeless encampments around Sacramento County where I have  
25 documented temperatures to which the unsheltered are being exposed. This includes  
26 temperatures, in some cases exceeding 125 degrees Fahrenheit taken inside tents provided at  
27 the Miller Park "Safeground". Attached hereto as Exhibit C is a true and correct copy of a  
28 June 27, 2022 report by local ABC news station Channel 10 which includes a link to a



1 YouTube video of the documentation of the extreme temperatures. Due to the impacts of  
2 climate the asphalt stays at about 140 plus degrees on hot days and on cooler days about  
3 120. Inside the motorhomes the temperatures are elevated especially when motorhomes have  
4 been swept from underneath shaded areas. We must remember that tents only have a thin  
5 layer of tarp on the bottom so people are in reality unprotected from the extreme heat  
6 absorbed and retained by the asphalt as well as the release of dangerous chemicals released  
7 from the superheated asphalt surface.

8  
9 6. Due to these circumstances many people have died on the streets. The Sacramento Homeless  
10 Union's position on the new weather requirement is that it has given them even more room  
11 to not have to open respite to those living on the streets, seniors or those who have the need  
12 for respite. The wording is not definitive and holds no real requirement and leaves for no  
13 accountability. Nevertheless, the National Weather Service guidelines themselves provide  
14 for special consideration and concern for particularly vulnerable populations such as the  
15 unhoused. The lack of cooling centers has left thousands of people on the street to  
16 potentially die under the medical circumstances as set forth by Dr Flojuane Cofer.

17  
18 7. While I am not going to go over every temperature that we collected I would like to point  
19 out the encampment at Evergreen. The first night we bought the infrared temperature gauge  
20 we went out to one of the camps we work with that is constantly hit with vehicle removals  
21 sweeps and more. At 709 p.m. we went out in the shade it was still 101.5° in the sun it was  
22 120.4° inside one of our union members tents it was still 102.6, and in the RV with  
23 cardboard insulated Windows it was 115.7. they were swept on 6/23/2022 just 3 days prior  
24 were they all had to move around.

25  
26 8. The situation with the tent and RV that I tested is critical for the courts to know. We have a  
27 mother, father, autistic twins and two other children at this encampment. The Union was  
28 able to get the mother and father and children into a local hotel. The mother and father both

1 work and because of the program they are not allowed to have anybody come and watch  
2 their children. Therefore, they need to bring the children to the encampment to be watched  
3 so they can work by the mother's mom. The programs that have been put in place are  
4 supposed to help people out of homelessness instead they are creating more barriers for  
5 multiple families as we receive multiple complaints. While again this encampment is in the  
6 city jurisdiction the heat and the fact that the water is no longer being delivered there falls on  
7 the county. The family and the children I'm talking about have been featured in the  
8 Sacramento Bee multiple times as their belongings have been taken, their inability to obtain  
9 shelter from the heat, lack of resourcing, and in fact the picture of their child crying in the  
10 window of the RV has been used in multiple stories.  
11

- 12 9. We had four children die last year in the encampments. We cannot leave people on the  
13 streets to die because we can't make a commitment to open a building with air conditioning  
14 or to provide water. I urge this Court to compel the County and City to stop the sweeps and  
15 open, staff, publicize using sound trucks and provide transportation to at least 20, fully  
16 accessible, 24-hours a day cooling centers NOW; not when we are already back in the  
17 extreme heat forecasted for the next 14 days.  
18

19 I declare under penalty of perjury under the laws of the United States of America and the  
20 State of California that the foregoing is a true and correct statement.  
21

22 Dated: July 6, 2022  
23

24 Executed at Sacramento, California      \_\_\_/s/ Crystal Rose Sanchez\_\_\_\_\_  
25  
26  
27  
28

# Exhibit A

## Sacramento County's unhoused population increases while San Francisco's decreases

Updated: 1:01 PM PDT Jun 29, 2022

Infinite Scroll Enabled



**Maricela De La Cruz**

Reporter

**SACRAMENTO, Calif.** — The sight of unsheltered individuals in Sacramento County is a common sight for anyone who lives in the area, and the latest census confirms there are even more people on the street.

The 2022 Sacramento Homelessness Point-in-Time Count was the first in three years, with last year's being canceled due to COVID-19. It is usually conducted every two years.



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Sacramento Steps Forward, a private nonprofit organization, is the lead agency in charge of the homeless count. It identified 9,278 individuals experiencing homelessness on any given night, a 67% increase from the last census, which recorded 5,570 individuals experiencing homelessness on any given night.

**[See this year's report here.](#)**

"Some of the reasons for the increase in unsheltered homelessness in our community and in California is most likely attributed to the high cost of housing and the lack of affordable housing," Lisa Bates with Sacramento Steps Forward said.

Both, sheltered and unsheltered counts increased since 2019.

- 2019 sheltered count: 1,670
- 2022 sheltered count: 2,744
- 2019 unsheltered count: 3,900
- 2022 unsheltered count: 6,664

### **Recommended**

#### **Gov. Newsom is visiting family in Montana. A California travel ban to the state doesn't apply, his team says**

The per capita homelessness in Sacramento is estimated to be 59 out of every 10,000 residents.

But as homelessness increased in Sacramento, KCRA 3 asked officials why [San Francisco is reporting a decrease](#) and now have lower numbers. They attributed the numbers partly to how data is collected. They add that preventative work is important to identify people before they fall into homelessness.

KCRA 3 spoke to Kelsey Dison and Kristin Schesser, who say they've been unhoused for about two years.

"It's harder now because once you hit rock bottom it's so hard. They look at you like you're an alien. They don't want to touch you; they don't want to be around you," Dison, who usually stays in downtown Sacramento, said.

Schesser is among the 19% of individuals identified to be living in their vehicles. She moved to Sacramento from Arizona.

"This is just temporary. This isn't something that's going to be permanent for me at all. And, if I go to a camp, I'm settling for that. If I build something that's 'homey,' then I'm settling and I



don't want to get used to it. I want this to be miserable so that I can have the drive to move up," Schesser said.

Nick Golling, the homeless services manager at the Department of Community Response in the city of Sacramento, said they need more shelter space.

"We need spaces that are safe to send people to so that they can work on identifying their barriers to housing and move to that next appropriate step," Golling said.

The Point-in-Time Count also shows that Black individuals, while they represent 11% of the overall Sacramento County population, they also make up 31% of the homeless population, making them three-to-four times more likely to experience homelessness than white individuals.

Since the last PIT count, shelter capacity has increased by 57%, providing shelter to 10,459 persons over three years.

### **Other key findings:**

- American Indian/Alaskan natives represent 2% of Sacramento County's population but made up 7% of the homeless population.
- 58% of unsheltered adults reported having at least one disability.
- A total of 1,600 tents and 1,100 vehicles were identified, four times higher than in 2019. Those in tents made up 30% of the unsheltered, 19% were in vehicles, and 22% were at other locations not considered suitable for human habitation.
- Veterans' homelessness decreased by 6%.
- Unsheltered homelessness by families with children was down by 31% since 2019. Research suggests that federal emergency assistance during the COVID-19 pandemic coupled with vouchers for hotels and motels also contributed to the decline.

## **GOOD HOUSEKEEPING**

# Exhibit B



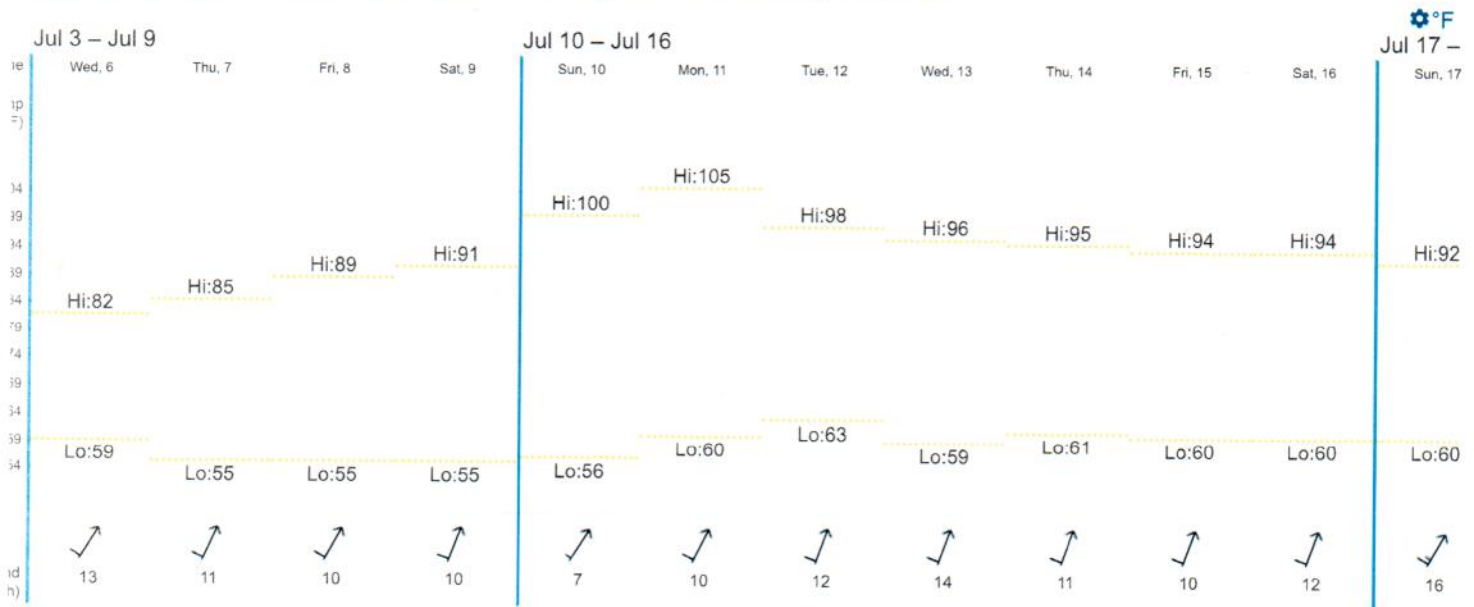
## Sacramento 14 Day Extended Forecast

Time/General Weather ▾ Time Zone DST Changes Sun & Moon ▾

Weather Today Weather Hourly 14 Day Forecast Yesterday/Past Weather Climate (Averages)

 **Currently:** 72 °F. Sunny. (Weather station: Sacramento Executive Airport, USA). [See more current weather >](#)

## Sacramento Extended Forecast with high and low temperatures



Wed, Jul 6

82 / 59 °F

Sunny.

Feels Like: 80 °F

Humidity: 41%

Precipitation: Rain: 0 Snow: 0

Precipitation Chance: 0%































SSW

Wind: 13 mph

[See weather overview >](#)

temperature weather feels like wind humidity chance amount uv sunrise sunset



Wed Jul 6		82 / 59 °F	Sunny.	80 °F	13 mph		1%	0%	-	7 (High)	5:48 am	8:33 pm
Thu Jul 7		85 / 55 °F	Sunny.	81 °F	11 mph		34%	0%	-	7 (High)	5:48 am	8:33 pm
Fri Jul 8		89 / 55 °F	Sunny.	84 °F	10 mph		29%	0%	-	7 (High)	5:49 am	8:32 pm
Sat Jul 9		91 / 55 °F	Sunny.	85 °F	10 mph		26%	0%	-	7 (High)	5:49 am	8:32 pm
Sun Jul 10		100 / 56 °F	Sunny.	93 °F	7 mph		18%	0%	-	7 (High)	5:50 am	8:31 pm
Mon Jul 11		105 / 60 °F	Sunny.	97 °F	10 mph		13%	0%	-	7 (High)	5:51 am	8:31 pm
Tue Jul 12		98 / 63 °F	Sunny.	94 °F	12 mph		18%	0%	-	7 (High)	5:51 am	8:31 pm
Wed Jul 13		96 / 59 °F	Mostly sunny.	91 °F	14 mph		17%	1%	-	7 (High)	5:52 am	8:30 pm
Thu Jul 14		95 / 61 °F	Sunny.	88 °F	11 mph		14%	1%	-	7 (High)	5:53 am	8:30 pm
Fri Jul 15		94 / 60 °F	Sunny.	88 °F	10 mph		11%	1%	-	7 (High)	5:54 am	8:29 pm
Sat Jul 16		94 / 60 °F	Sunny.	88 °F	12 mph		14%	3%	-	7 (High)	5:54 am	8:29 pm
Sun Jul 17		92 / 60 °F	Sunny.	87 °F	16 mph		21%	3%	-	7 (High)	5:55 am	8:28 pm
Mon Jul 18		94 / 60 °F	Sunny.	88 °F	9 mph		15%	3%	-	7 (High)	5:56 am	8:27 pm
Tue Jul 19		97 / 62 °F	Sunny.	91 °F	9 mph		12%	3%	-	7 (High)	5:57 am	8:27 pm
Wed Jul 20		97 / 63 °F	Sunny.	91 °F	12 mph		13%	3%	-	7 (High)	5:57 am	8:26 pm

\* Updated Wednesday, July 6, 2022 8:22:55 am Sacramento time - Weather by CustomWeather, © 2022

[Hour-by-hour weather for Sacramento next 7 days >](#)

Advertising

# Exhibit C

## Sacramento hit with lawsuit by homeless union advocates over respite centers



Sacramento Homeless Union members filed a lawsuit against the city and county over respite centers, places for unhoused people to chill out and get access resources.

Author: abc10.com

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Updated: 11:18 PM PDT June 27, 2022